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June 25, 2015

Via Certified Mail - Return Receipt Requested
Managing Agent
Buse Timber & Sales, Inc.
3812 28th Pl. NE
Everett, WA 98201-8602

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent:

We represent Puget Soundkeeper Alliance, 130 Nickerson Street, Suite 107, Seattle, WA 98109, (206) 297-7002. Any response or correspondence related to this matter should be directed to Smith & Lowney, PLLC. at the letterhead address. This letter is to provide you with sixty-days notice of Puget Soundkeeper Alliance's intent to file a citizen suit against Buse Timber & Sales, Inc. ("Buse") under section 505 of the Clean Water Act ("CWA"), 33 U.S.C. § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Buse's National Pollution Discharge Elimination System ("NPDES") permit.

Buse was granted coverage effective September 20, 2002 under Washington's Industrial Stormwater General Permit ("ISGP") issued by the Washington Department of Ecology ("Ecology") on August 21, 2002, effective September 20, 2002, modified on December 1, 2004, reissued on August 15, 2007, effective September 15, 2007, reissued again on October 15, 2008, effective November 15, 2008, and remaining effective through December 31, 2009, under National Pollutant Discharge Elimination System Permit No. SO3-000097 (the "2002 Permit"). Buse was granted coverage under the subsequent iteration of the ISGP issued by Ecology on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, and remaining effective through January 1, 2015, under NPDES Permit No. WAR-000097 (the "2010 Permit"). Ecology granted coverage under the current iteration of the ISGP, issued by Ecology on December 3, 2014, effective January 2, 2015, and set to expire on December 31, 2019, (the "2015 Permit") and maintains the same permit number, WAR-000097.

Buse has violated and continues to violate the terms and conditions of the 2010 Permit and 2015 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and other pollutants from, its facility located at or near 3812 28th Pl. NE Everett, WA 98201-8602 (the "facility"). The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Buse.

I. COMPLIANCE WITH STANDARDS.

A. Violations of Water Quality Standards.

Condition S10.A of the Permits prohibit discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric standards. Furthermore, narrative water quality standards apply with equal force, even when Ecology has established numeric water quality standards. Specifically, Condition S10.A of the Permits require that Buse's discharges not cause or contribute to violations of Washington State's water quality standards.

Buse discharges stormwater to Union Slough, which flows to Puget Sound. Buse discharges stormwater that contains elevated levels of turbidity, chemical oxygen demand, and zinc as indicated in the tables of discharge monitoring data below. Further, the data provided in the tables below represent samples collected from only one of Buse's discharge points. Discharges of stormwater from the facility cause and/or contribute to violations of water quality standards for turbidity, chemical oxygen demand, zinc, and aesthetic criteria and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. These water quality standards include those set forth in WAC 173-201A-200, -240, and -260(2). Precipitation data from the last five years are appended to this notice of intent to sue and identify days when precipitation met or exceed 0.1 inches per day.

Table 1: Discharge Monitoring Report ("DMR") Data for Buse Timber & Sales, Inc. under the 2002 Permit

	Turbidity (NTU) (Benchmark 25 NTU) (Action Level 50 NTU)	pH (su) (Benchmark 6-9 su) (Action Level outside the range of 5-10)	Zinc (ug/L) (Benchmark 117 µg/L) Action Level (372 µg/L)	Oil &Grease (mg/L) (Benchmark 15 mg/L) (Action Level 30 mg/L)	BOD5 (mg/L) (Benchmark 30 mg/L) (Action Level 60 mg/L)	Copper (ug/L) (Benchmark 63.6 ug/L (Action Level 149 ug/L)	Lead (ug/L) (Benchmark 81.6 ug/L) (Action Level 159 ug/L)
1Q 2005	**26**	6	NR	NR	9	NR	NR
2Q 2005	20	6	NR	6	11	NR	NR
4Q 2005	12.6	6.0	80	NR	7	NR	NR
2Q 2006	21	6	30	6	13	18	**190**
3Q 2006	**55**	6	**130**	10	**32**	19	74
4Q 2006	**76**	6	72	NR	NR	13	NR
1Q 2007	**38**	6	69	NR	13	NR	NR
3Q 2007	15	6	NR	NR	6	NR	NR
4Q 2007	**62**	6	41	NR	25	NR	NR
1Q 2008	**150**	6	NR	6	30	NR	NR
2Q 2008	**28**	6	NR	NR	16	NR	NR
3Q 2008	10	6	NR	NR	18	NR	NR
4Q 2008	8	6	NR	NR	NR	20	NR
1Q 2009	**120**	6	45	NR	**45**	NR	NR
4Q 2009	**34**	6	62	NR	25	NR	NR

Notes

- Bold = benchmark exceedance
- Underline = action level exceedance
- NR = no value reported for pollutant or value marked as "non-detect"

Table 2: DMR Data for Buse Timber & Sales, Inc. under the 2010 and 2015 Permits							
Quarter in which sample collected	Turbidity (NTU) (Bench-mark 25 NTU)	pH (su) (Bench-mark 5-9 su)	Zinc (µg/L) Concen-tration (Benchm ark 117 µg/L)	Oil Sheen (Yes/No) (Benchmark = No visible oil sheen)	Copper (µg/L) (Benchmark = 14 µg/L)	Chemical Oxygen Demand (mg/L) (Benchmark 120 mg/L)	Total Suspended Solids (mg/L) (Benchmark 100 mg/L)
1Q 2010	28 3.8 7.9 Avg = 13.24	6.7 NR 6.7	NR NR NR	No No No	NR NR 33 Avg. = 16.5	170 NR 22 Avg. = 96	27 NR NR Avg. = 13.5
2Q 2010	14	6.7	NR	No	NR	34	26
3Q 2010	23	6.5	65	No	NR	100	45
4Q 2010	10	6.7	17	No	NR	**200**	11
1Q 2011	CA	CA	CA	No	7.8	37	CA
2Q 2011	CA	CA	CA	No	CA	34	CA
3Q 2011	CA	CA	CA	No	CA	35	CA
4Q 2011	CA	CA	CA	No	CA	57	CA
1Q 2012	CA	CA	CA	No	CA	CA	CA
2Q 2012	CA	CA	CA	No	CA	CA	CA
3Q 2012	23	6.46	50	No	5.2	**130**	28
4Q 2012	8.8	7.22	NR*	No	NR*	20	29
1Q 2013	38 11.62 Avg. = 24.81	7.03	70	No	9.5	81	47
2Q 2013	25	7.36	21	No	<10	110	29
3Q 2013	CA	CA	CA	No	CA	55	CA
4Q 2013	CA	CA	CA	No	CA	33	CA
1Q 2014	CA	CA	CA	No	CA	29	CA
2Q 2014	CA	CA	CA	No	CA	88	CA
3Q 2014	CA	CA	CA	No	CA	33	CA
4Q 2014	CA	CA	CA	No	CA	CA	CA
1Q 2015	CA	CA	CA	No	CA	CA	CA

Notes:

- Quarters with more than one value reported for a pollutant reflect data reported by Buse for multiple samples taken and analyzed for certain pollutant(s)
- Avg. = the average pollutant concentration calculated for a quarter in which Buse reported pollutant concentrations for two or more stormwater samples taken in a single quarter
- CA = consistent attainment of the benchmark asserted by Buse's DMR
- Bold = benchmark exceedance
- NR = no value reported for pollutant or value marked as "ND" for "non-detect"
- * = Buse reported in its DMR that it diluted the stormwater sample taken for 4Q 2012 before conducting an analysis for zinc and copper, making this analysis invalid.

B. Compliance with Standards.

Condition S10.C of the Permits requires Buse to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparing and implementing an adequate SWPPP and best management practices ("BMPs"). Buse has violated and continues to violate these conditions by failing to apply AKART to its discharges by, among other things, failing to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge. *See* Tables 1 and 2; Section I.A. These violations have occurred on each and every day for the previous five years and continue to occur every day.

Condition S1.A of the Permits require that all discharges and activities authorized be consistent with the terms and conditions of the permit. Buse has violated this condition by discharging and acting inconsistent with the conditions of the Permits as described in this Notice of Intent to Sue.

II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

Puget Soundkeeper Alliance hereby provides notice, based upon information and belief, that Buse has not developed and implemented a SWPPP that complies with the requirements of the Permits. In the following section, Puget Soundkeeper Alliance provides notice of SWPPP violations on information and belief.

Condition S3.A.1 of the Permits require Buse to develop and implement a SWPPP as specified in these permits. Condition S3.A.2 of the Permits require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, Buse has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART and BMPs necessary to comply with state water quality standards.

Condition S3.A of the Permits require Buse to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. On information and belief, Buse has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, is not fully implemented, and has not been updated as necessary.

The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits requires that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.B.4 of the 2015 Permit requires that the SWPPP detail how and where the selected BMPs will be implemented. Condition S3.A.3 of the Permits requires that the SWPPP include BMPs consistent with approved stormwater technical manuals or document how stormwater BMPs included in the SWPPP are

demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. Buse's SWPPP does not comply with these requirements because it does not adequately describe and explain in detail the BMPs selected, does not include BMPs consistent with approved stormwater technical manuals, and does not include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

Buse's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, the regular business hours, and the seasonal variations in business hours or in industrial activities.

Buse's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

Buse's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these permit conditions.

Buse's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for each material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of

significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

Buse's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

Condition S3.B.4 of the Permits requires that permittees include in their SWPPPs and implement certain mandatory BMPs unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP are provided. Buse is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits.

Buse's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage and treatment facilities, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, including identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Buse will comply with signature and record retention requirements, certification of compliance with the SWPPP and Permit, and all inspection reports completed by Buse).

Buse's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

Buse's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Buse's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

Buse's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

Buse's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology. The SWPPP also fails to include a sampling plan that complies with the Permit's sampling requirements, which include Condition S4.B of the Permits. Buse's sampling plan designates DP-1 as the only sampling location for the Facility but samples taken from this location are not representative of stormwater discharges from the Facility because they include water and pollutants from the ground , other industrial facilities, the highway, and other sources. The SWPPP also fails to identify other locations of discharges from Buse's facility that must be sampled, such as SW-1 (the outfall from the Facility's stormwater collection system), SW-2, and discharges into the tributary of Union Slough and/or the wetland that surrounds the perimeter of Buse's Facility.

III. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permits require Buse to collect a sample of its stormwater discharge once during every calendar quarter. Condition S4.B.1.d of the Permits requires Buse to obtain representative samples, which Appendix 2 of the Permits defines as "a sample of the discharge that accurately characterizes stormwater runoff generated in the designated drainage area of the facility. Conditions S3.B.5.b and S4.B.2.c of the Permits require Buse to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. Condition S4.B.6 of the 2010 Permit, as modified in 2012, and the 2015 Permit, allow Buse to suspend sampling for one or more parameters based on consistent attainment of benchmark values when eight consecutive quarterly samples are under or equal to the benchmark values but require Buse to re-start counting of consistent attainment when it did not collect a sample but should have. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met.

Buse violated these requirements by failing to collect stormwater samples in compliance with the requirements of the 2010 Permit during the following quarters:

2nd Quarter 2010
3rd Quarter 2010

4th Quarter 2010
1st Quarter 2011
2nd Quarter 2011
3rd Quarter 2011
4th Quarter 2011
1st Quarter 2012
2nd Quarter 2012
3rd Quarter 2012
4th Quarter 2012
1st Quarter 2013
2nd Quarter 2013
3rd Quarter 2013
4th Quarter 2013
1st Quarter 2014
2nd Quarter 2014
3rd Quarter 2014
4th Quarter 2014
1st Quarter 2015

On information and belief, Buse has violated and continues to violate these conditions because it does not take representative samples from each distinct point of discharge off-site each quarter. Buse takes stormwater samples from a single location that it refers to as DP-1, which is located north of the facility at or about Union Slough, and drains a tributary of and/or wetland connected to Union Slough that surrounds the perimeter of the Facility. Buse refers to this tributary and/or wetland as a ditch and has admitted to the Department of Ecology that it includes groundwater, stormwater from the highway and other properties, is a wetland, is considered historic Smith Slough, and has standing water days after a storm event. The Department of Ecology has identified at least portions of this ditch as an unnamed stream/river. *See* https://fortress.wa.gov/ecy/wqamapviewer/default.aspx?res=1920x1080. On information and belief, Buse has violated and continues to violate these conditions by taking samples from a location where a tributary flows into Union Slough rather than an outfall from the Facility and/or not obtaining representative samples of stormwater from Buse's Facility because stormwater samples from DP-1 include water from other sources. On information and belief, Buse has also violated and continues to violate these conditions because it has improperly suspended sampling for one or more parameters based on "consistent attainment" of the benchmark values after failing to properly take stormwater samples.

These violations have occurred and continue to occur each and every quarter during the last five years that Buse was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not all, points of discharge. These violations will continue until Buse commences monitoring all distinct points of discharge and taking representative samples.

B. Failure to Analyze Quarterly Samples.

Condition S5.A.1 of the Permits requires Buse to analyze stormwater samples collected quarterly for turbidity, pH, total copper, total zinc, oil sheen, chemical oxygen demand, and total suspended solids.

Buse violated these conditions by failing to analyze stormwater samples for any of the required parameters during the following quarters:

2nd Quarter 2010
3rd Quarter 2010
4th Quarter 2010
1st Quarter 2011
2nd Quarter 2011
3rd Quarter 2011
4th Quarter 2011
1st Quarter 2012
2nd Quarter 2012
3rd Quarter 2012
4th Quarter 2012
1st Quarter 2013
2nd Quarter 2013
3rd Quarter 2013
4th Quarter 2013
1st Quarter 2014
2nd Quarter 2014
3rd Quarter 2014
4th Quarter 2014
1st Quarter 2015

C. Failure to Timely Submit Discharge Monitoring Reports.

Condition S9.A of the Permits require Buse to use DMR forms provided or approved by Ecology to summarize, report and submit monitoring data to Ecology. For each monitoring period (calendar quarter) a DMR must be completed and submitted to Ecology not later than 45 days after the end of the monitoring period. Buse has violated these conditions by failing to submit a DMR within the time prescribed for the following quarters:

2nd Quarter 2010
3rd Quarter 2010
4th Quarter 2010
1st Quarter 2011
2nd Quarter 2011
3rd Quarter 2011
4th Quarter 2011
1st Quarter 2012

2nd Quarter 2012
3rd Quarter 2012
4th Quarter 2012
1st Quarter 2013
2nd Quarter 2013
3rd Quarter 2013
4th Quarter 2013
1st Quarter 2014
2nd Quarter 2014
3rd Quarter 2014
4th Quarter 2014
1st Quarter 2015

D. Failure to Comply with Visual Monitoring Requirements.

Condition S7.A of the Permits requires that monthly visual inspections be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed).

Condition S7.C of the Permits requires that Buse record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the 2010 Permit, a summary report and schedule of implementation of the remedial actions that Buse plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

Buse is in violation of these requirements of Condition S7 of the Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.

IV. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements of the Permits.

Condition S8.B of the Permits requires Buse take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range for pH. Condition S8.A of the 2015 Permit requires that Buse implement any Level One Corrective Action required by the 2010 Permit.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires Buse: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the 2010 Permit and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the 2010 Permit; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits. Condition S8.B.4 of the Permits requires that Buse implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Condition S5.A and Tables 2 and 3 of the Permits establish the following benchmarks: turbidity 25 NTU; pH 5 – 9 SU; total copper 14 µg/L; total zinc 117 µg/L; chemical oxygen demand 120 mg/L; and total suspended solids 100 mg/L.

Buse has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time since January 1, 2010, that quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 2 in Section I.A. of this letter.

These benchmark excursions are based upon information currently available to Puget Soundkeeper Alliance from Ecology's publicly available records. Puget Soundkeeper Alliance provides notice of its intent to sue Buse for failing to comply with all of the Level One Corrective Action requirements described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time during the last five years its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, including the benchmark excursions listed in Table 2 above.

B. Violations of the Level Three Requirements of the Permits.

Condition S8.D of the Permits requires Buse comply with Level Three requirements each time quarterly stormwater sample results exceed an applicable benchmark value or are

outside the benchmark range for pH for any three quarters during a calendar year. Condition S8.A of the Permits requires that Buse implement any Level Three responses required by the previous version of the Permit and continue to operate and/or maintain any source control or treatment BMPs related to such responses..

Condition S4.C of the 2002 Permit required Buse to perform a "Level Three Response," which shall be immediately initiated "if any four quarterly samples collected after December 31, 2004 are above the action levels." As required by Condition S4.C of the 2002 Permit, a Level Three Response consists of the following actions: prompt identification of the potential sources of stormwater contamination that are causing or contributing to the presence of the benchmark parameter; investigation of all available options of source control, operational control and stormwater treatment BMPs to reduce stormwater contaminant levels to or below permit benchmark values; implementation of the additional source control, operational control and stormwater treatment BMPs identified as part of this investigation within twelve months of initiating the level three response; preparation of a level three source control report outlining actions taken, planned and scheduled to reduce stormwater contaminant levels including stormwater treatment BMPs; and submission of the level three source control report to Ecology within twelve months of initiation of the level three response.

Condition S4.C of the 2002 Permit established the following action levels: turbidity 50 NTU; pH 5-10 SU; total zinc 372 µg/L; oil and grease 30 mg/L; BOD5 60 mg/L; total copper 149 µg/L; total lead 159 µg/L. Table 1 above provides Buse's stormwater sampling results under the 2002 Permit. Buse exceeded these action levels as described in Table 1 above.

Buse is in violation of the 2015 Permit and the 2010 Permit for failing to perform Level Three responses whenever four of its quarterly sampling results collected after December 31, 2004 and before January 1, 2010 were above the identified action levels for a parameter, for these parameters in accordance with the requirements describe above, including failure to promptly identify potential sources of contamination, failure to investigate all available options for BMPs, failure to implement source control, operational control, and treatment BMPs identified in such investigations, failure to prepare and submit to Ecology Level Three source control reports for these parameters, and failure to continue to operate and/or maintain any BMPs related to such response. As indicated in Table 1 above, these violations include, but are not limited to, Buse's failure to fulfill these obligations for turbidity upon receipt of its stormwater sampling results for the first quarter 2008. For example, Buse did not fulfill these obligations by installing turbidity curtains because the curtains, which were installed within the tributary of and/or wetland connected to Union Slough that Buse refers to as a ditch, do not remove pollutants from Buse's stormwater and are not therefore treatment BMPs.

V. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.

Condition S9.B of the Permits requires Buse to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in Condition S8.B through S8.D. If a corrective action is not yet completed at the time of submission of the annual report, Buse must describe

the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date Buse expects to complete corrective actions.

Buse has violated this condition by failing to include all of the required information in the annual report it submitted for 2010, 2011, 2012, 2013, and 2014. For example, each of these reports fails to include all information about potential and actual stormwater problems identified during the previous calendar year through month site inspections. Additionally, the annual report submitted by Buse for 2010 (on May 16, 2011) indicates that a Level 1 Corrective Action was triggered for copper and COD but Buse did not identify the sources of those pollutants nor an additional operational BMP that would be implemented in response. The annual report submitted by Buse for 2012 (on May 14, 2013) explains that groundwater enters the ditch that Buse samples but fails to identify this as an actual stormwater problem; Buse's disclosure that groundwater enters the ditch that is sampled reveals that Buse's stormwater samples are not representative of the facility's discharges.

VI. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B.3 of the Permits requires Buse record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Buse collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Buse could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon information and belief, Buse is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

B. Failure to Retain Records.

Condition S9.C of the Permits requires Buse to retain for a minimum of five years a copy of the Permits, a copy of Buse's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permits. Upon information and belief, Buse is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

VII. PROHIBITED DISCHARGES.

Condition S5.E. of the Permits prohibits illicit discharges and the discharge of process wastewater. Appendix 2 of the Permits defines "illicit discharges" to include "any *discharge* that is not composed entirely of *stormwater* except (1) discharges authorized pursuant to a separate NPDES permit, or (2) conditionally authorized non-stormwater discharge identified in Condition S5.D." Appendix 2 of the Permits defines stormwater as "that portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a stormwater drainage system into a defined surface water body, or a constructed infiltration facility." In contrast to stormwater, Appendix 2 of the Permits defines leachate as "water or other liquid that has percolated through raw material, product, or waste and contains substances in solution or suspension as a result of the contact with these materials," and process wastewater as "any non-stormwater which, during manufacturing or processing, comes into direct contact or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product."

On information and belief, Buse has violated and continues to violate these conditions by discharging non-stormwater discharges from the Facility. For example, Buse discharges non-stormwater pollutants from the gravel dock located along Union Slough that is a receiving area for logs that have been floated to and/or from the Facility. These non-stormwater pollutants may include leachate, water from Union Slough that becomes contaminated with pollutants through Buse's operations, gravel, bark, wood waste, debris, soil, sawdust, logs, dust, other wood products, and other pollutants from the log receiving area and dock. On information and belief, Buse also discharges non-stormwater from a sink and urinal that are connected to the stormwater system.

VIII. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the 2015 Permit, Puget Soundkeeper Alliance hereby requests that Buse Timber & Sales, Inc. provide a copy of, or access to, its SWPPP complete with all incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Buse fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit, it will be in violation of that condition, which violation shall also be subject to this Notice of Intent to Sue and any ensuing lawsuit.

VIII. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Puget Soundkeeper Alliance. These violations are ongoing. Puget Soundkeeper Alliance intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), each of the above-described violations subjects the violator to a penalty of up to $37,500 per day for each violation. In addition to civil penalties, Puget Soundkeeper Alliance will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 U.S.C. § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Puget Soundkeeper Alliance believes that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. Puget Soundkeeper Alliance intends, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Buse under Section 505(a) of the Clean Water Act for the violations described herein.

Puget Soundkeeper Alliance is willing to discuss effective remedies for the violations described in this letter and settlement terms during the 60-day notice period. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within ten (10) days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By: _____
Richard A. Smith

Puget Soundkeeper Alliance
Katelyn Kinn, Staff Attorney

cc: Gina McCarthy, Administrator, U.S. EPA
Dennis McLerran, Region 10 Administrator, U.S. EPA
Maia Bellon, Director, Washington Department of Ecology
Registered Agent, Diana Martin, 3812 28th Pl. NE, Everett, WA 98201

Date Precipitation (in). Date Precipitation (in). Date Precipitation (in). Date Precipitation (in).

2010	Precip. (in)
Jun	sum
24	0
25	0
26	0
27	0
28	0
29	0
30	0

2010	Precip. (in)
Jul	sum
1	0.03
2	0.02
3	0
4	0.01
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0.06
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0.01
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	0
30	0
31	0

2010	Precip. (in)
Aug	sum
1	0
2	0.01
3	0
4	0
5	0
6	0
7	0.13
8	0.17
9	0.03
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0.46
23	0
24	0
25	0
26	0.41
27	0
28	0.01
29	0
30	0
31	1.28

2010	Precip. (in)
Sep	sum
1	0.49
2	0
3	0
4	0.05
5	0
6	0.23
7	0.13
8	0.03
9	0.04
10	0.02
11	0
12	0.02
13	0
14	0
15	0.07
16	0.4
17	0.28
18	0.39
19	0.39
20	0.43
21	0.04
22	0.01
23	0.12
24	0.01
25	0
26	0.34
27	0.01
28	0.05
29	0.01
30	0.01

2010	Precip. (in)
Oct	sum
1	0
2	0
3	0.06
4	0
5	0.01
6	0.01
7	0
8	0.05
9	0.27
10	0.33
11	0
12	0
13	0.01
14	0.06
15	0.06
16	0
17	0
18	0.01
19	0
20	0.01
21	0.01
22	0.07
23	0.41
24	0.6
25	0.01
26	0.04
27	0.1
28	0.02
29	0
30	0.21
31	0.02

2010	Precip. (in)
Nov	sum
1	0.62
2	0
3	0
4	0
5	0.08
6	0.28
7	0.01
8	0.18
9	0.09
10	0
11	0.02
12	0.01
13	0.12
14	0.11
15	0.14
16	0.02
17	0.42
18	0.01
19	0.08
20	0.01
21	0.02
22	0.04
23	0
24	0
25	0.01
26	0.23
27	0.13
28	0.01
29	0.02
30	0.36

2010	Precip. (in)
Dec	sum
1	0
2	0
3	0
4	0
5	0
6	0.01
7	0.4
8	0.57
9	0.39
10	0.01
11	0.23
12	0.96
13	0.37
14	0.31
15	0.1
16	0
17	0
18	0.12
19	0.06
20	0.07
21	0.1
22	0.07
23	0.47
24	0.29
25	0.18
26	0.1
27	0.08
28	0.11
29	0.24
30	0
31	0

2011	Precip. (in)
Jan	sum
1	0
2	0
3	0
4	0.02
5	0.22
6	0.26
7	0.27
8	0.13
9	0
10	0
11	0.15
12	0.36
13	0.19
14	0
15	0.29
16	0.11
17	0.47
18	0.12
19	0
20	0.21
21	0.44
22	0
23	0.05
24	0.17
25	0
26	0
27	0.01
28	0
29	0.2
30	0.01
31	0

2011	Precip. (in)
Feb	sum
1	0
2	0
3	0.01
4	0.16
5	0.01
6	0.23
7	0.19
8	0
9	0
10	0
11	0
12	0.27

Precipitation at Paine Field, Everett from June 24, 2010 until June 24, 2015

Date	Precipitation (in).
13	0.12
14	0.89
15	0.08
16	0.04
17	0.09
18	0
19	0
20	0
21	0.05
22	0.18
23	0.13
24	0
25	0
26	0.01
27	0.06
28	0.02
2011	Precip. (in)
Mar	sum
1	0.06
2	0.08
3	0.14
4	0.21
5	0
6	0.02
7	0
8	0.05
9	0.78
10	0.57
11	0.03
12	0.46
13	0.8
14	0.82
15	0.62
16	0.31
17	0
18	0.28
19	0.01
20	0
21	0.42
22	0
23	0
24	0.05
25	0.03
26	0.04
27	0.05
28	0.04
29	0.08
30	0.35
31	0
2011	Precip. (in)
Apr	sum
1	0.57
2	0.1
3	0.02
4	0.1
5	0.35
6	0.56
7	0.11
8	0
9	0
10	0.2
11	0.06
12	0.01

Date	Precipitation (in).
13	0.04
14	0.55
15	0.01
16	0.18
17	0.03
18	0.06
19	0.12
20	0.08
21	0.08
22	0
23	0
24	0.01
25	0.49
26	0
27	0.22
28	0.01
29	0.04
30	0
2011	Precip. (in)
May	sum
1	0
2	0.32
3	0.04
4	0
5	0.11
6	0.15
7	0.29
8	0.14
9	0
10	0
11	0.25
12	0
13	0
14	0.5
15	0.42
16	0.37
17	0
18	0
19	0
20	0
21	0.05
22	0.1
23	0
24	0
25	0.22
26	0.07
27	0.18
28	0
29	0
30	0
31	0.03
2011	Precip. (in)
Jun	sum
1	0.04
2	0.1
3	0.04
4	0
5	0
6	0
7	0.16
8	0.03
9	0
10	0

Date	Precipitation (in).
11	0
12	0
13	0.09
14	0.19
15	0.07
16	0
17	0
18	0.23
19	0.02
20	0
21	0
22	0
23	0.04
24	0.07
2011	Precip. (in)
Jun	sum
25	0.05
26	0
27	0.01
28	0
29	0.07
30	0.2
2011	Precip. (in)
Jul	sum
1	0
2	0
3	0.17
4	0
5	0
6	0
7	0.23
8	0.01
9	0
10	0
11	0
12	0.01
13	0.01
14	0.04
15	0.04
16	0.07
17	0.12
18	0
19	0.02
20	0
21	0.16
22	0
23	0
24	0
25	0.11
26	0.04
27	0.01
28	0
29	0
30	0
31	0.04
2011	Precip. (in)
Aug	sum
1	0
2	0
3	0
4	0
5	0
6	0

Date	Precipitation (in).
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	0
30	0
31	0
2011	Precip. (in)
Sep	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0.07
26	0.17
27	0.02
28	0
29	0.01
30	0.01
2011	Precip. (in)
Oct	sum
1	0
2	0.15
3	0.02
4	0.01

Precipitation at Paine Field, Everett from June 24, 2010 until June 24, 2015

Date	Precipitation (in).
5	0.21
6	0.03
7	0.18
8	0.03
9	0.01
10	0.03
11	0.16
12	0.05
13	0.01
14	0
15	0
16	0
17	0
18	0.01
19	0.02
20	0.05
21	0.3
22	0.32
23	0.01
24	0
25	0
26	0
27	0
28	0.08
29	0
30	0.07
31	0.09

2011	Precip. (in)
Nov	sum
1	0
2	0.27
3	0
4	0.01
5	0.01
6	0
7	0.01
8	0
9	0
10	0
11	0.22
12	0.11
13	0
14	0.06
15	0.02
16	0.15
17	0.28
18	0.17
19	0
20	0
21	0.54
22	1.52
23	1.03
24	0.37
25	0
26	0
27	0.61
28	0.02
29	0.04
30	0.01

2011	Precip. (in)
Dec	sum
1	0.02
2	0
3	0
4	0
5	0
6	0
7	0.01
8	0
9	0
10	0.01
11	0.07
12	0
13	0
14	0.02
15	0.02
16	0
17	0
18	0.06
19	0
20	0.03
21	0
22	0
23	0
24	0.12
25	0.12
26	0.05
27	0.16
28	0.05
29	0.13
30	0.09
31	0

2012	Precip. (in)
Jan	sum
1	0
2	0.26
3	0.01
4	0.25
5	0
6	0.01
7	0.01
8	0
9	0.03
10	0
11	0
12	0
13	0
14	0.47
15	0.02
16	0.06
17	0.31
18	0.3
19	0.21
20	0.48
21	0.24
22	0.27
23	0
24	0.04
25	0.07
26	0.01
27	0
28	0
29	0.31
30	0.23
31	0

2012	Precip. (in)
Feb	sum
1	0.27
2	0
3	0
4	0
5	0
6	0
7	0
8	0.02
9	0.39
10	0.07
11	0
12	0.02
13	0.18
14	0.01
15	0
16	0.03
17	0.4
18	0.23
19	0.22
20	0.14
21	0.83
22	0.06
23	0
24	0.18
25	0.12
26	0
27	0
28	0.25
29	0.25

2012	Precip. (in)
Mar	sum
1	0.18
2	0.11
3	0.03
4	0
5	0.49
6	0.02
7	0
8	0
9	0.2
10	0.15
11	0.03
12	0.9
13	0
14	0.35
15	0.53
16	0.09
17	0.2
18	0.18
19	0.03
20	0.09
21	0
22	0.08
23	0
24	0
25	0
26	0.04
27	0.08
28	0.22
29	0.89
30	0.59
31	0.35

2012	Precip. (in)
Apr	sum
1	0.08
2	0
3	0.28
4	0
5	0.08
6	0
7	0
8	0
9	0
10	0
11	0.43
12	0.01
13	0
14	0
15	0
16	0.06
17	0.03
18	0.02
19	0.23
20	0.39
21	0
22	0
23	0
24	0.08
25	0.34
26	0.26
27	0
28	0
29	0.05
30	0.41

2012	Precip. (in)
May	sum
1	0.32
2	0.21
3	0.5
4	0.65
5	0.15
6	0
7	0
8	0
9	0.01
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0.14
21	0.23
22	0.17
23	0.47
24	0.02
25	0.01
26	0
27	0
28	0.01
29	0

Precipitation at Paine Field, Everett from June 24, 2010 until June 24, 2015

Date	Precipitation (in).
30	0.04
31	0.06
2012	Precip. (in)
Jun	sum
1	0.11
2	0.02
3	0
4	0.04
5	0.32
6	0.13
7	0.31
8	0
9	0
10	0
11	0
12	0.22
13	0.21
14	0
15	0
16	0.07
17	0.15
18	0.64
19	0.09
20	0
21	0
22	0.57
23	0.35
24	0
2012	Precip. (in)
Jun	sum
25	0
26	0.13
27	0
28	0
29	0
30	0.13
2012	Precip. (in)
Jul	sum
1	0.05
2	0.09
3	0.29
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0.11
14	0
15	0.04
16	0
17	0
18	0
19	0
20	0.44
21	0
22	0.23
23	0
24	0
25	0

Date	Precipitation (in).
26	0
27	0
28	0
29	0
30	0
31	0
2012	Precip. (in)
Aug	sum
1	0
2	0
3	0.05
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0.01
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	0
30	0
31	0
2012	Precip. (in)
Sep	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0.24
11	0
12	0.01
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0.01
22	0.04

Date	Precipitation (in).
23	0
24	0
25	0
26	0.01
27	0.01
28	0
29	0
30	0
2012	Precip. (in)
Oct	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0.07
13	0.19
14	0.2
15	0.2
16	0.15
17	0
18	0.44
19	0.65
20	0.15
21	0.11
22	0.16
23	0.01
24	0.08
25	0.05
26	0.07
27	0.21
28	0.19
29	0.03
30	0.79
31	1.15
2012	Precip. (in)
Nov	sum
1	0.12
2	0.07
3	0.03
4	0.09
5	0
6	0.02
7	0.07
8	0
9	0
10	0
11	0.18
12	0.06
13	0.28
14	0.01
15	0
16	0.27
17	0.23
18	0.73
19	1.85
20	0.26

Date	Precipitation (in).
21	0.46
22	0
23	0.36
24	0.06
25	0
26	0
27	0
28	0.22
29	0.14
30	1.38
2012	Precip. (in)
Dec	sum
1	0.29
2	0.46
3	0.32
4	0.43
5	0
6	0.02
7	0.03
8	0.1
9	0.14
10	0
11	0.13
12	0.27
13	0.13
14	0.26
15	0.16
16	0.74
17	0.5
18	0.06
19	1.37
20	0.58
21	0.04
22	0.11
23	0.35
24	0.06
25	0.4
26	0.27
27	0.16
28	0
29	0.15
30	0
31	0
2013	Precip. (in)
Jan	sum
1	0
2	0
3	0.16
4	0
5	0.09
6	0.13
7	0.22
8	0.24
9	1.07
10	0.04
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0

Precipitation at Paine Field, Everett from June 24, 2010 until June 24, 2015

Date	Precipitation (in).
19	0
20	0
21	0
22	0
23	0.27
24	0.08
25	0.01
26	0.31
27	0.17
28	0.83
29	0.64
30	0.14
31	0.07
2013	Precip. (in)
Feb	sum
1	0.03
2	0
3	0.04
4	0
5	0.09
6	0.08
7	0.16
8	0
9	0.03
10	0
11	0.05
12	0
13	0.03
14	0.08
15	0.01
16	0.49
17	0.01
18	0
19	0
20	0.04
21	0.01
22	0.04
23	0.03
24	0
25	0.07
26	0.02
27	0.2
28	0.14
2013	Precip. (in)
Mar	sum
1	0
2	0.22
3	0
4	0
5	0.02
6	0.36
7	0.25
8	0
9	0
10	0.01
11	0
12	0.12
13	0.17
14	0.01
15	0
16	0.31
17	0.04
18	0.03

Date	Precipitation (in).
19	0.22
20	0.69
21	0.01
22	0.6
23	0
24	0
25	0
26	0
27	0
28	0.02
29	0.01
30	0.01
31	0
2013	Precip. (in)
Apr	sum
1	0
2	0
3	0
4	0.32
5	0.09
6	0.1
7	1.08
8	0.06
9	0
10	0.06
11	0.09
12	0.19
13	0.07
14	0
15	0.11
16	0.02
17	0
18	0.12
19	0.28
20	0.18
21	0.18
22	0
23	0
24	0
25	0
26	0
27	0.16
28	0.09
29	0.03
30	0
2013	Precip. (in)
May	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0.22
13	0.05
14	0
15	0.08
16	0.02

Date	Precipitation (in).
17	0.01
18	0
19	0
20	0
21	0.34
22	0.07
23	0.02
24	0.01
25	0
26	0.09
27	0.04
28	0
29	0.28
30	0
31	0
2013	Precip. (in)
Jun	sum
1	0
2	0.02
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0.03
12	0
13	0
14	0
15	0
16	0
17	0.02
18	0
19	0.04
20	0.83
21	0.02
22	0
23	0.05
24	0.11
2013	Precip. (in)
Jun	sum
25	0.35
26	0.07
27	0.06
28	0
29	0
30	0
2013	Precip. (in)
Jul	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0

Date	Precipitation (in).
13	0
14	0
15	0
16	0
17	0.04
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	0
30	0
31	0.02
2013	Precip. (in)
Aug	sum
1	0
2	0.26
3	0.01
4	0
5	0
6	0
7	0
8	0
9	0
10	0.06
11	0.03
12	0
13	0
14	0.02
15	0.06
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0.01
28	0.12
29	1.47
30	0
31	0
2013	Precip. (in)
Sep	sum
1	0
2	0
3	0.15
4	0.03
5	0.11
6	0.54
7	0.23
8	0.12
9	0.07

Precipitation at Paine Field, Everett from June 24, 2010 until June 24, 2015

Date	Precipitation (in).
10	0.04
11	0.03
12	0.03
13	0.01
14	0.02
15	0.01
16	0.01
17	0.02
18	0.02
19	0.01
20	0.02
21	0.01
22	0.01
23	0.01
24	0
25	0.13
26	0
27	0.04
28	0.53
29	0.56
30	0
2013	Precip. (in)
Oct	sum
1	0.04
2	0.24
3	0.01
4	0
5	0
6	0.01
7	0.72
8	0.04
9	0.01
10	0
11	0.01
12	0.01
13	0.01
14	0
15	0.01
16	0
17	0
18	0.01
19	0.01
20	0
21	0
22	0.01
23	0.01
24	0.01
25	0.01
26	0
27	0.29
28	0
29	0
30	0
31	0.04
2013	Precip. (in)
Nov	sum
1	0.01
2	0.57
3	0.06
4	0.05
5	0.07
6	0.03
7	0.42

Date	Precipitation (in).
8	0
9	0.05
10	0.08
11	0.01
12	0.08
13	0
14	0.02
15	0.31
16	0.01
17	0
18	0.16
19	0.4
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	0
30	0.04
2013	Precip. (in)
Dec	sum
1	0.41
2	0.13
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0.01
13	0.02
14	0
15	0
16	0
17	0
18	0
19	0
20	0.26
21	0.17
22	0.29
23	0.26
24	0
25	0
26	0
27	0.05
28	0
29	0
30	0.03
31	0.01
2014	Precip. (in)
Jan	sum
1	0
2	0.3
3	0
4	0
5	0

Date	Precipitation (in).
6	0
7	0.42
8	0.22
9	0.07
10	0.1
11	1.02
12	0.15
13	0.01
14	0
15	0
16	0.01
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0.27
29	0.58
30	0.13
31	0.03
2014	Precip. (in)
Feb	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0.04
9	0.02
10	0.13
11	0.3
12	0.12
13	0
14	0.28
15	0.42
16	0.71
17	0.11
18	0.31
19	0.02
20	0.01
21	0
22	0.25
23	0.37
24	0.35
25	0
26	0
27	0
28	0
2014	Precip. (in)
Mar	sum
1	0.08
2	0.54
3	0.17
4	0.14
5	1.02

Date	Precipitation (in).
6	0.52
7	0
8	0.47
9	0.51
10	0.2
11	0.01
12	0
13	0.03
14	0.1
15	0.01
16	1.43
17	0.01
18	0
19	0.42
20	0
21	0
22	0
23	0
24	0
25	0.1
26	0.11
27	0.02
28	0.19
29	0.56
30	0.01
31	0
2014	Precip. (in)
Apr	sum
1	0
2	0
3	0.06
4	0
5	0.18
6	0.07
7	0
8	0.16
9	0
10	0
11	0
12	0
13	0
14	0
15	0.02
16	0.32
17	0.39
18	0.01
19	0.05
20	0
21	0.05
22	0.36
23	0.06
24	0.27
25	0
26	0.12
27	0.57
28	0
29	0
30	0
2014	Precip. (in)
May	sum
1	0
2	0.06
3	0.24

Precipitation at Paine Field, Everett from June 24, 2010 until June 24, 2015

Date	Precipitation (in).
4	0.39
5	0.03
6	0
7	0
8	0.22
9	0.2
10	0.01
11	0
12	0
13	0
14	0
15	0
16	0
17	0.05
18	0
19	0
20	0
21	0
22	0
23	0.12
24	0.03
25	0.08
26	0.04
27	0
28	0
29	0
30	0
31	0

2014	Precip. (in)
Jun	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0.08
9	0
10	0
11	0
12	0.01
13	0.43
14	0.1
15	0.2
16	0.09
17	0.04
18	0
19	0.06
20	0.08
21	0
22	0
23	0.01
24	0

2014	Precip. (in)
Jun	sum
25	0
26	0.01
27	0.01
28	0.04
29	0
30	0

2014	Precip. (in)
Jul	sum
1	0
2	0
3	0
4	0.01
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0.02
20	0.02
21	0
22	0
23	0.96
24	0.08
25	0.01
26	0
27	0
28	0
29	0
30	0
31	0

2014	Precip. (in)
Aug	sum
1	0
2	0.02
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0.04
12	0.04
13	0.97
14	0.01
15	0.02
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	0.01
30	0.06

2014	Precip. (in)
	31	0.2
2014	Precip. (in)
Sep	sum
1	0
2	0.33
3	0.2
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0.15
18	0.08
19	0.05
20	0
21	0
22	0.01
23	0.36
24	0.48
25	0.16
26	0.69
27	0.06
28	0
29	0.08
30	0.01

2014	Precip. (in)
Oct	sum
1	0
2	0
3	0
4	0.01
5	0
6	0
7	0
8	0
9	0
10	0
11	0.04
12	0
13	0.3
14	0.45
15	0.38
16	0
17	0.11
18	0.03
19	0
20	0.57
21	0.08
22	0.84
23	0.07
24	0.13
25	0.86
26	0.02
27	0.01
28	0.34
29	0
30	0.55
31	0.79

2014	Precip. (in)
Nov	sum
1	0
2	0.11
3	0.32
4	0.17
5	0.13
6	0.37
7	0
8	0
9	0.42
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0.01
21	0.52
22	0.11
23	0.23
24	0.08
25	0.36
26	0.01
27	0.01
28	0.99
29	0.23
30	0

2014	Precip. (in)
Dec	sum
1	0
2	0
3	0
4	0.02
5	0.09
6	0.16
7	0
8	0.38
9	0.32
10	0.95
11	0.52
12	0
13	0
14	0
15	0
16	0
17	0.11
18	0.35
19	0.18
20	0.15
21	0.2
22	0
23	0.6
24	0.29
25	0.4
26	0
27	0.44
28	0.69

Precipitation at Paine Field, Everett from June 24, 2010 until June 24, 2015

Date	Precipitation (in).	Date	Precipitation (in).	Date	Precipitation (in).	Date	Precipitation (in).
29	0	11	0	29	0	12	0.03
30	0	12	0	30	0	13	0.14
31	0	13	0.04	31	0.24	14	0.01
2015	Precip. (in)	14	0.04	2015	Precip. (in)	15	0
Jan	sum	15	0	Apr	sum	16	0
1	0	16	0	1	0.11	17	0
2	0.02	17	0	2	0	18	0
3	0	18	0	3	0.1	19	0
4	0.22	19	0.1	4	0	20	0
5	0.69	20	0.04	5	0	21	0
6	0	21	0	6	0	22	0
7	0	22	0	7	0	23	0
8	0	23	0	8	0	24	0
9	0	24	0	9	0	25	0
10	0.1	25	0.1	10	0.08	26	0
11	0.02	26	0.11	11	0.2	27	0
12	0.01	27	0.57	12	0	28	0
13	0	28	0	13	0.29	29	0
14	0	2015	Precip. (in)	14	0.05	30	0
15	0.23	Mar	sum	15	0	31	0
16	0.01	1	0	16	0	2015	Precip. (in)
17	0.65	2	0	17	0	Jun	sum
18	0.03	3	0	18	0	1	0.08
19	0.01	4	0	19	0	2	0.16
20	0	5	0	20	0	3	0.17
21	0.01	6	0	21	0.2	4	0
22	0.03	7	0	22	0.01	5	0
23	0.23	8	0	23	0.02	6	0
24	0	9	0	24	0.08	7	0
25	0.01	10	0	25	0.07	8	0
26	0	11	0.02	26	0	9	0
27	0.03	12	0	27	0.01	10	0
28	0	13	0.01	28	0.11	11	0
29	0	14	0.29	29	0.05	12	0
30	0	15	1.59	30	0.06	13	0
31	0	16	0.02	2015	Precip. (in)	14	0
2015	Precip. (in)	17	0.01	May	sum	15	0
Feb	sum	18	0	1	0	16	0
1	0.03	19	0.12	2	0	17	0
2	0.15	20	0.07	3	0	18	0.01
3	0.1	21	0	4	0	19	0.01
4	0.14	22	0.04	5	0.17	20	0
5	0.73	23	0.09	6	0	21	0
6	0.36	24	0.19	7	0	22	0
7	0.44	25	0.18	8	0	23	0
8	0.16	26	0	9	0	24	0
9	0.1	27	0.06	10	0		
10	0.16	28	0	11	0		

Precipitation at Paine Field, Everett from June 24, 2010 until June 24, 2015